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August 3, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: North Dakota Network Co. d/b/a SRT Wireless
E911 Location Accuracy Implementation Plan and Progress Report
PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of North Dakota Network Co. d/b/a SRT Wireless, is its E911 location accuracy implementation plan and progress report.

Should you have any questions, please contact undersigned counsel.

Sincerely,

/s/ Michael R. Bennet

Michael R. Bennet

Attachment

4832-8107-7302, v. 1

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

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Wireless E911 Location Accuracy Requirements) PS Docket No. 07-114

North Dakota Network Co. E911 Implementation Plan and Initial Progress Report

North Dakota Network Co. d/b/a SRT Wireless ("SRT"), pursuant to Section 20.18(i)(4)(i)-(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its location accuracy implementation plan and initial progress report.

SRT is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. SRT entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable SRT to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). SRT has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(1) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

SRT plans to maintain its network and continue to utilize the LPM tool to meet the current FCC accuracy requirement. SRT is in the process of selling its license and plans on no longer providing CMRS service when future location accuracy benchmarks go into effect in April of 2018. Should there be unanticipated delays in the sale of its license, SRT does not expect to need to take any additional steps to meet the April 2018 benchmark since its location accuracy currently exceeds that benchmark.



Steven D. Lysne

CEO/General Manager

Date: August 1, 2017